

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

J.H., a minor, by and through his
parent and natural guardian, Kirsten
Lindsey,

Case No. 0:20-cv-02038-DWF-TNL

Plaintiff,

v.

Independent School District No. 623
aka Roseville Area Schools,
Geraldine Cook in her individual
capacity,

**DECLARATION OF SAM KRAMER
IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF
PETITION TO APPROVE MINOR
SETTLEMENT UNDER
MINN. STAT. § 540.08**

Defendants.

I, Sam Kramer, declare as follows:

1. I am one of Plaintiff J.H.'s attorneys in this matter. I am over the age of 18 and am competent to testify.
2. **Exhibit A**, attached hereto, is a true copy of the Settlement Agreement reached by the parties in this matter.
3. On November 12, 2021, the parties appeared for a Settlement Conference with Magistrate Judge Tony Leung. The parties negotiated with the assistance of Judge Leung, and ultimately agreed to settle the case through a joint payment by

Defendants of [REDACTED] to Plaintiff in exchange for Plaintiff releasing all claims and stipulating to the dismissal of his case, with prejudice.

4. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

5. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

6. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. Defense Counsel reviewed all pleadings associated with Plaintiff's Petition for Minor Settlement and have consented to the filing of those pleadings and the captioning of the motion as "uncontested."

I declare under penalty of perjury that the foregoing is true and correct.

DATED: February 15, 2022

/s/ Sam Kramer
Attorney for Plaintiff